

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-Form Complaint and:

Floyd Little, et al. v. National Football League, et al.

Court File No. 2:12-cv-2219-AB

**MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL  
FOR PLAINTIFF  
CURLEY CULP**

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed, P.L.L.P. ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Curley Culp only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Floyd Little, et al. v. National Football League, et al.*, No. 2:12-cv-2219-AB, in the Eastern District of Pennsylvania on April 24, 2012, for the benefit of several retired National Football League players, including Curley Culp.
2. Plaintiffs' counsel filed a short form complaint for Plaintiff Curley Culp on July 16, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiff Curley Culp and the undersigned.

4. Plaintiffs' counsel properly notified Curley Culp of counsel's intention to withdraw from representing him in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Curley Culp only in Court File No. 2:12-cv-2219-AB.

Dated: June 10, 2015

Respectfully submitted,

ZIMMERMAN REED, P.L.L.P.

s/ Brian C. Gudmundson

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Charles S. Zimmerman (#120054)  
J. Gordon Rudd, Jr. (#222082)  
Brian C. Gudmundson (#336695)  
1100 IDS Center, 80 South 8th Street  
Minneapolis, MN 55402  
Telephone: (612) 341-0400  
Facsimile: (612) 341-0844  
Charles.Zimmerman@zimmreed.com  
Gordon.Rudd@zimmreed.com  
Brian.Gudmundson@zimmreed.com